

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA,

CASE NO. 22-20235 Cr. Bloom

vs.

DANIEL LESIN,

Defendant.

**DANIEL LESIN'S UNOPPOSED
MOTION TO CONTINUE TRIAL**

Daniel Lesin files this Unopposed Motion to Continue the Trial currently set for August 15, 2022, and requests a status conference.

1. On June 2, 2022, a grand jury in the Southern District of Florida returned an indictment which charges Mr. Lesin with four counts of wire fraud. The Indictment also contains a forfeiture count.

2. Mr. Lesin made his initial appearance in the Southern District of Florida on July 1, 2022 after being arrested in the District of New Jersey on June 2, 2022. Mr. Lesin consented to pre-trial detention and is in custody pending trial.

3. Mr. Lesin was arraigned on July 7, 2022.

4. On July 5, 2022, the Court set this case for trial on August 15, 2022 with a calendar call on August 9, 2022.

5. The United States timely produced discovery for the case on July 21, 2022. The discovery includes approximately 132,000 pages of materials including extensive bank records and financial information.

6. In light of the amount of discovery, the complexity of the allegations in the Indictment, and the fact that Mr. Lesin is being detained (which makes discussions with counsel and review of discovery less difficult), it will not be possible for the defense to be ready for trial by August 15, 2022.

7. Under the circumstances, the defense requests that the Court continue the trial and set a status conference so the parties and the Court can address an appropriate trial schedule and possible disposition.

8. Mr. Lesin is prepared to make an appropriate Speedy Trial Act (18 U.S.C. § 3161) waiver to allow for the requested continuance.

9. The prosecutor assigned to this case has indicated that the United States does not oppose the relief requested in this motion.

Based on the foregoing, Mr. Lesin requests that the Court grant this motion, continue the trial date, and set a status conference to set a trial schedule.

August 2, 2022

Respectfully Submitted,

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BINHAK, P.L.L.C.**

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CERTIFICATE OF SERVICE

I hereby certify that on August 2, 2022, I electronically filed the foregoing motion with the Clerk of Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

/s/ Stephen James Binhak
STEPHEN JAMES BINHAK